



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

December 27, 2024

By ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Nash v. U.S. Immigration and Customs Enforcement*, No. 21 Civ. 4288 (JPC)
Nash v. U.S. Immigration and Customs Enforcement, No. 23 Civ. 6994 (JPC)

Dear Judge Cronan:

This Office represents U.S. Immigration and Customs Enforcement (“ICE”) in the above-named actions brought by Plaintiff Lindsay Nash under the Freedom of Information Act. We write respectfully on behalf of both parties to provide a status update in accordance with the Court’s Order of October 31, 2024, ECF No. 63.

Plaintiff has made a demand for costs and fees, and ICE is currently undertaking an assessment of that demand and anticipates being in a position to respond within the next 60 days. The parties therefore propose that they submit another status letter on or before March 3, 2025, informing the Court if they anticipate being able to resolve the issue of fees and costs and, if not, proposing next steps.

We thank the Court for its attention to this matter.

Respectfully,

EDWARD Y. KIM
Acting United States Attorney

By: /s/ Jessica F. Rosenbaum
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